

EXHIBIT “A”**RICO STATEMENT****QUESTION # 2**

DEFENDANT	MISCONDUCT	BASIS OF LIABILITY
Prince Abdullah	<p>In his capacity as the de facto ruler of Saudi Arabia, Prince Abdullah has consistently appointed al Qaida supporters and collaborators to head the charities controlled by the Kingdom in order to ensure that the charities would continue to serve as vehicles for sponsoring and sustaining terrorist organizations, including al Qaida. Additionally, Prince Abdullah has made significant personal contributions to Saudi-based charities that he knew to be sponsors of al Qaida’s global operations, knowing and intending that those contributions would be used to fund al Qaida’s global operations and acts of terror. Further, Prince Abdullah engaged in transactions with Mushayt for Trading establishment, the funding mechanism for the Spanish al Qaida cell. Still further, Muhammed Galeb Klaje Zouaydi, who founded the network of companies which served as a vehicle for financing al Qaida’s activities in Europe, served for many years as Prince Abdulah’s accountant. During the period of time that Mushayt for Trading was laundering money for the Spanish cell, Prince Abdulah and Zouaydi maintained a business partnership. Thus, through his official and personal acts, Prince Abdullah has provided critical financial and logistical support to al Qaida for a period of many years, knowing and intending that this support would be used to fund al Qaida’s global operations and acts of terror, the foreseeable culmination of which was the Attack.</p>	<p>1962(c)</p> <p>1962(d)</p>

Prince Bandar	In his capacity as Ambassador to the United States, Prince Bandar has directed millions of dollars in embassy funds and of his personal wealth to charities operating within al Qaida's infrastructure, thereby providing critical financial and logistical support to al Qaida for a period of many years, knowing and intending that those contributions would be used to fund al Qaida's global operations and acts of terror, the foreseeable culmination of which was the Attack.	1962(c) 1962(d)
Prince Mohamed	In his capacity as chairman of Dar al Maal al Islami, Faisal Islamic Bank of the Sudan and Al Shamal Bank, Prince Mohamed has facilitated the material sponsorship of al Qaida by those entities. Additionally, Prince Mohamed has made significant personal contributions to Saudi-based charities that he knew to be sponsors of al Qaida's global operations, knowing and intending that those contributions would be used to fund al Qaida's global operations and acts of terror. , knowing and intending that those contributions would be used to fund al Qaida's global operations and acts of terror, the foreseeable culmination of which was the Attack.	1962(c) 1962(d)
Prince Naif	In his capacity as Minister of Interior, Prince Naif has been, for many years, responsible for the oversight of charities based within Saudi Arabia. Under Prince Naif's direction, one such charity, the Saudi Joint Relief Commission, diverted \$74 million to al Qaida members and loyalists. Through yet another, the Saudi Committee for Relief to Afghans, Prince Naif has channeled substantial financial and logistical support to sustain al Qaida's presence and operations in Afghanistan. Further, Prince Naif has used his position as Minister of the Interior to protect al Qaida's support infrastructure. Remarkably, Prince Naif publicly denied al Qaida's responsibility for the Attack. Further, Prince Naif has also made large personal contributions to Saudi-based charities for the purpose of supporting	1962(c) 1962(d)

	terrorism, with the knowledge and intent the contributions he made would be used to fund al Qaida's global operations and acts of international terrorism. Thus, Prince Naif has provided critical financial and logistical support to al Qaida for a period of many years, knowing and intending that those contributions would be used to fund al Qaida's global operations and acts of terror, the foreseeable culmination of which was the Attack..	
Prince Salman	In his capacity as founder of the Saudi High Commission, Prince Salman has long provided material support and resources to al Qaida, has donated substantial funds to several other charities that operate within al Qaida's infrastructure, and has been instrumental in raising funds for these charities from third parties. Prince Salman knew and intended that the contributions he made to, and funds he raised on behalf of, these charities would be used to fund al Qaida's global operations and acts of international terrorism. Prince Salman thus has provided critical financial and logistical support to al Qaida for a period of many years, knowing and intending that those contributions would be used to fund al Qaida's global operations and acts of terror, the foreseeable culmination of which was the Attack..	1962(c) 1962(d)
Prince Sultan	In his capacity as the Chairman of the Supreme Council for Islamic Affairs, established by King Fahd in 1994 to oversee and control charitable organizations with operations within the Kingdom of Saudi Arabia, Prince Sultan has known, for a period of many years, that Saudi-based charities were providing material support and resources to al Qaida. Rather than intervening to stem the flow of money and support from the charities to al Qaida, Prince Sultan has used his authority as Chairman of the Supreme Council to facilitate and ensure the continuing sponsorship of al Qaida by those charities. In addition, Prince Sultan provided substantial funding, in both his official and private	1962(c) 1962(d)

	capacities, to several charities deeply involved in the sponsorship of al Qaida's global operations Prince Sultan knew and intended that the contributions he made to these charities would be used to fund al Qaida's global operations and acts of international terrorism, but has nonetheless provided critical financial and logistical support to al Qaida for a period of many years, knowing and intending that those contributions would be used to fund al Qaida's global operations and acts of terror, the foreseeable culmination of which was the Attack.	
Prince Turki	In his capacity as head of Saudi Arabia's general intelligence service, the Istakhbarat, between 1977 and 2001, the Istakhbarat provided massive financial aid and material support to the Taliban. At the time, al Qaida and the Taliban maintained a symbiotic and mutually supportive relationship. Prince Turki knew and intended that the support provided to the Taliban by the Kingdom of Saudi Arabia under his direction would materially benefit al Qaida, by virtue of the close relationship and near identity between the two organizations. Additionally, Prince Turki made significant personal contributions to Saudi-based charities that he knew to be sponsors of al Qaida's global operations, and coordinated the sponsorship of al Qaida by several wealthy members of Saudi society, knowing that all such contributions would be used to fund al Qaida's global operations and acts of international terrorism, knowing and intending that those contributions would be used to fund al Qaida's global operations and acts of terror, the foreseeable culmination of which was the Attack.	1962(c) 1962(d)